

PUBLIC COMMENTS ON DRAFT ETS RISK ASSESSMENT

NAME

1. D.W. Sepkovic. Ph.D, Senior Associate,
American Health Foundation
Dana Road
Valhalla, New York 10595

DATE: 7/17/90

COMMENT:

Requested that the EPA correctly spell his name in the list of references of the draft risk assessment.

2. NAME

Stephen L. McDonough, M.D.
Chief, Preventive Health Section
North Dakota State Department of
Health and Consolidated Laboratories
State Capitol
600 E. Boulevard Avenue
Bismarck, ND 58505-0200

DATE: 7/17/90

COMMENT:

McDonough's agency believes the Guide represents an accurate portrayal of passive smoke induced health problems. He recommends strengthening the recommendations found on page 5 of the Guide. He goes on to encourage more thorough investigation of separately vented smoking rooms and to concur with the recommendations for smoking cessation programs and involving employees and labor unions.

NAME

3. Samuel D. Chilcote, Jr., President
The Tobacco Institute
1875 I Street NW
Suite
Washington, DC

DATE: 7/24/90

COMMENT:

Request for a 60 day public comment period extension.

2023990011

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

4. John Slade, M.D., Chairman
Commission on Smoking OR Health
Cancer and Tobacco Use Control Program
New Jersey State Department of Health
CN 369
Trenton, NJ 08625-0369

DATE: 8/1/90

COMMENT:

Slade and his agency fully endorse the conclusions of Health Effects of Passive Smoking: Assessment of Lung Cancer in Adults and Respiratory Disorders in Children. However, Slade's Commission expresses disappointment over the fact that the risk assessment "does not consider the substantial evidence that tobacco smoke pollution is also a cause of coronary artery disease in nonsmokers."

NAME

5. Joseph F. Cullman, 3rd, Chairman Emeritus,
Philip Morris Companies, Inc.
100 Park Avenue
New York, New York 10017

DATE: 8/10/90

COMMENT:

Commented on the ETS studies to date and raised his concerns about EPA's review process. The response from the Administrator to Mr. Cullman is also attached.

NAME

6. Larry Kraft, Professor of Law
University of North Dakota School of Law
Grand Forks, ND 58202

DATE: 8/10/90

COMMENT:

Based on his independent review of the references cited in the policy guide he comments that the EPA conclusions outlined in the draft document are correct, although he states that the numbers are significantly underestimated. He writes that he has gathered proof that the tobacco companies are sending magazines a strong message that they will pull food and tobacco ads from any publication that lets the public know the "true facts" about the hazards of secondhand smoke. Enclosed an article he wrote in 1988 "Smoking in Public Places: Living With a Dying Custom."

2023990012

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

7. Douglas M. Costabile, M.D.
President
Medical Society of New Jersey
Two Princess Road
Lawrenceville, NJ 08648

DATE: 8/14/90

COMMENT:

On behalf of the Medical Society of New Jersey, Dr. Costabile endorses the conclusions of Health Effects of Passive Smoking and praises EPA for its work. He categorizes the risk assessment as "reasonable, temperate interpretation of the available data" and "a thorough and thoughtful report." Finally, he calls the classification of tobacco smoke pollution as a known human carcinogen "a welcomed step."

8. B. Schneider, Ph.D.
Medizinische Hochschule Hannover
Institut für Biometrie
Zentrum Biometrie, Medizinische Informatik
and Medizintechnik
Postfach 61 01 80
D-3000 Hannover 61

DATE: 8/6/90

COMMENT:

Dr. Schneider takes issue with the conclusion "that passive smoking is causally associated with lung cancer in adults." His 8-page comment demonstrates the studies' failures to achieve a significant global association between and lung cancer. He notes that the so-called "significant" study results are based on multiple testing without adjustment of selected effects and significance level. He goes on to assert that with a correct hierarchical testing procedure, "no significant association is revealed and therefore the statement of causality is lacking in empirical basis."

2023990013

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

9. John P. Toutonghi, Ph.D.
Seattle University
Department of Physics
Seattle, WA 98122

DATE: 8/14/90

COMMENT:

Toutonghi criticizes the draft for treating the Garfinkel study too lightly. He claims EPA should accept "the obvious conclusion" of Garfinkel's work and thereby concede that in the U.S. no causal link between ETS and lung cancer has been established.

NAME

10. Viola Waite
801 Spring Street, #910-B
Seattle, WA 98104

DATE: 8/15/90

COMMENT:

Mrs. Waite provides a sensationalistic attack on the draft document. She goes on to blast the EPA, the media, and others who could be loosely labeled as nonsmokers' rights advocates. She attaches "Appendix D: Notes on SAMMEC Methodology" from a Washington State Health Department Report and an article entitled "Scientists Can Food Themselves" from the Christian Science Monitor.

NAME

11. James F. Callahan
Executive Director
American Society of Addiction Medicine, Inc.
12 West 21st Street
New York, NY 10010

DATE: 8/15/90

COMMENT:

Callahan submits his organization's endorsement of the draft document's conclusions, encourages EPA to examine the relationship between tobacco smoke pollution and coronary artery disease in nonsmokers, and praises the classification of tobacco smoke pollution as a known human carcinogen.

2023990014

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

12. John R. Myers
John R. Myers Co. - Consultant to the Plastics
Blown Film Industry
477 Maple Circle Drive
Cincinnati, OH 45246

DATE: 8/20/90

COMMENT:

Mr. Myers calls the determination that 3800 Americans died from second-hand smoke last year the result of "vague, statistically cooked numbers." He sarcastically requests to have a list of the 3800 people sent to him. He goes on to blast drug-addicts for not paying taxes while nicotine addicts do and then claims that there can be no justification for limiting the rights of cigarette addicts. Finally, he demands, "Please get to work on issues with more substance and leave this puny smoking issue in the hands of the local people, where it belongs."

NAME

13. Jeffrey Arp-Sandel, M.D.
Community Health Plan at Canaan
Route 295
Canaan, NY 12029

DATE: 8/20/90

COMMENT:

Dr. Arp-Sandel writes to strongly recommend that ETS be classified as a Group A Carcinogen.

NAME

14. Hazel J. Heddings, M.D.
Marc A. Rozner, Ph.D., M.D.
1506 Confederate Avenue
Richmond, VA 23227-4406

COMMENT:

Drs. Heddings and Rozner applaud EPA for their work. They discuss the fact that Thomas Bliley, Virginia's 3rd U.S. District Representative, claims to represent his entire constituency in attacking EPA's objectivity with regard to ETS studies. They describe Bliley's close relationship to tobacco interests and express their opposition, as 3rd District residents, to Bliley's stances with regard to tobacco, ETS, and EPA.

2023990015

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

15. Joan B. Wolff, Ph.D.
8007 Westover Drive
Prospective, KY 40059

DATE: 8/20/90

COMMENT:

Wolff and her husband have smoked cigarettes for a combined 99 years. Her disjointed letter blasts the government for spending tax dollars fighting smokers and closes with the statement, "Down with you McCarthyites!"

NAME

16. Ragnar Rylander, M.D.
Professor in Environmental Hygiene
University of Gothenburg
Box 33031
400 33 Gothenburg, Sweden

COMMENT:

Dr. Rylander, whose background is in toxicological and epidemiological work on effects of environmental substances on the lung, provides comments of three types. He notes textual omissions of studies (primarily his own) and citations. He discusses biological plausibility, concluding that the arguments for biological plausibility in the draft do not reflect a critical scientific evaluation of the different toxicological and epidemiological concepts. Additionally, he discusses the importance of the diet in preventing lung cancer.

NAME

17. Dr. Angelo Cerioli
Istoconsult
26012 Catelleone (CR), Italy

DATE: 8/21/90

COMMENT:

Dr. Cerioli writes to comment on the drafts comparison of various modelling techniques for estimating the yearly number of lung cancer deaths due to ETS. The pertinent section is Appendix D of the draft. He discusses the Relative Potency Approach (Approach 1) and concludes that the approach cannot be scientifically supported.

2023990016

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

17. Stanton A. Glantz, Ph.D.
University of California, San Francisco
Moffitt Hospital, Room 1186
San Francisco, CA 94143-0124

DATE: 8/22/90

COMMENT:

Commends EPA on its work. He notes four sections as particularly strong: (1) discussion of individual epidemiological studies, (2) analysis of Hirayama versus Garfinkel, (3) discussion of misclassification errors and the effects of background exposures, and (4) discussion of ETS dosimetry. His only criticism is that the treatment of evidence relating childhood exposure to ETS and asthma justifies stronger conclusions than those conclusions found in the draft.

NAME

19. Joseph W. Cherner
Smokefree Educational Services, Inc.
375 South End Avenue, Suite 32F
New York, NY 10280

DATE: 8/22/90

COMMENT:

Provides a copy of an article he wrote for SkyWord (American Airlines' flight attendants magazine) concerning non-smoking flight attendants who have lung cancer and other respiratory diseases attributed to many years in smoke-filled airplanes. He hopes that the information included in his articles will be included in the final report.

2023990017

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

20. Louise C. Chut, Ph.D., M.P.H.
Chair, The Public Health Council of The
New Jersey State Department of Health
CN 360
Trenton, NJ 08625-0360

DATE: 8/22/90

COMMENT:

Dr. Chut writes to note that her department concurs with the conclusions that ETS is a cause of lung cancer among exposed nonsmokers and that ETS is a health hazard to exposed youngsters. Her council hopes that EPA will ultimately accept these findings.

NAME

21. Alfred H. Lowrey, Ph.D.

DATE: 8/23/90

COMMENT:

Lowrey comments on two issues. First, he urges EPA to include a more comprehensive evaluation of exposure-response in the final draft. Second, he asserts that discussion of the magnitude of the proposed risk from ETS is inadequate. Finally, he requests an invitation to the Science Advisory Board hearings.

NAME

22. Jennifer Austin, M.S.
Health Educator
County of Gloucester
Carpenter Street & Allens Lane
Woodbury, N.J. 08096-2699

DATE: 8/27/90

COMMENT:

Austin is impressed with the draft which she feels "clearly documents the link between passive smoking and lung cancer." She applauds EPA for addressing the issues of smoker-nonsmoker harassment and exposure of children to smoke. Finally, she encourages EPA to further explore the relationship between smoking and emphysema.

2023990018

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

23. Jose A. Lambelet
Cigarette Technology Corporation
P.O. Box 8029
Foster City, CA 94404

DATE: 8/28/90

COMMENT:

Mr. Lambelet and his corporation provide information on ETS volume reduction through changing the cigarette. He mentions the Philip Morris/Virginia Slims, "superslims", as an example of a cigarette which produces "70% less smoke from the lit end." He claims that by changing the cigarette, "An ETS reduction (up to 80%) could be universal, applying to the workplace and to public as well as private places."

NAME

24. Steve Urben
10804 Opal Trail
Austin, TX 78750

DATE: None

COMMENT:

Mr. Urben characterizes the draft as "a truthful assessment of the danger of ETS that has harmed so many innocent people over the years." He then states that the tobacco companies and the Tobacco Institute should be barred from having any input into the final product "since they are the ones that profit from the death and misery that the users of their product inflict on so many others." (postcard)

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DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

25. Juliette Muscat
Conservation Chair
New York City Audubon Society
71 W. 23rd Street
Suite 1430
New York, N.Y. 10010

DATE: 9/6/90

COMMENT:

Muscat expresses her organization's satisfaction with the draft. They are particularly pleased about the classification of tobacco smoke as a Class A carcinogen. The organization's overall position on smoking is that smoking "should not take place where it inconveniences or endangers the health of others. Both indoors and outdoors, people should refrain from smoking where others might be exposed to their second-hand tobacco smoke."

NAME

26. Thomas P. Houston, M.D.
American Medical Association
535 North Dearborn Street
Chicago, IL 60610

DATE: 9/6/90

COMMENT:

Dr. Houston writes on behalf of the AMA to express agreement with the draft's conclusions. The AMA concurs with the classification of ETS as a known carcinogen. They find the mortality estimates "conservative and appropriately justified," and the pediatric disease data "sound and logically determined." He urges EPA to take strong steps in the areas of public education, indoor air quality standards, and restrictions on ETS in public places. He recommends an OSHA Emergency Temporary Standard until new regulations are mandated.

2023990020

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

27. Elizabeth Johnson
Sierra Club Air Quality Committee
703 Polk Street
San Francisco, CA 94109

DATE: 9/6/90

COMMENT:

The Sierra Club supports the report. The group is particularly supportive of the classification of ETS as a Group A carcinogen and finds the reports primary strengths to be its (1) objectivity; (2) federal recognition of a critical health problem; and (3) abilities as a publicity mechanism. Johnson also asserts that the connection between ETS and heart disease needs to be investigated by EPA.

NAME

28. Sharon Lynn Campbell, M.A.
Certified Safety Professional
S.L.C. Communications
11815 Spruce Orchard Drive
St. Louis, MO 63146

DATE: 9/6/90

COMMENT:

Campbell praises the draft's authors and makes two recommendations for the final document. First, she suggests that the issue of accommodating people covered by The Americans with Disabilities Act (particularly those whose disabilities might be worsened by ETS) be addressed. Second, she suggests use of the term "tobacco addict" in place of "smoker."

NAME

29. Colleen K. Richman
Manager, Smoking or Health
American Lung Association
1100 E. Hector Street
Conshocken, PA 19428-0866

DATE: 9/6/90

COMMENT:

Richman writes in support of the draft and pledges her assistance on the final report.

2023990021

DRAFT RISK ASSESSMENT PUBLIC COMMENTS (Continued)

NAME

30. K. Michael Cummings, Ph.D., MPH
Director, Smoking Control Program
Roswell Park Cancer Institute
Elm and Carlton Streets
Buffalo, NY 14263

DATE: 9/4/90

COMMENT:

Cummings commends the review group on its analysis and submits copies of two of his own articles which were cited incorrectly. He also submits an article regarding the effects of indoor air pollution on otitis and asthma in young children. He believes the article which will soon be published in Laryngoscope may be of use for the final report. Cummings asserts that the best method of quantifying the cancer risk associated with ETS is the epidemiologic direct population attributable risk method. His only criticism of the draft is that he believes stronger conclusions are warranted on the merits of the evidence relating childhood exposure to ETS and asthma.

NAME

31. Milo Brekke, Ph.D.
President, Brekke Associates
5112 Washburn Avenue South
Minneapolis, MN 55410
and
Thomas E. Kottke, M.D.
Senior Associate Consultant, Mayo Clinic
Harwick 6
Rochester, MN 55905

DATE: 9/5/90

COMMENT:

Brekke and Kottke reviewed the draft's statistical methodology at the request of Dr. Thomas Houston. They conclude that the methods were appropriately applied. Their single criticism relates to the finding (pp. 4-8) that 60% of nonsmoking females are likely exposed to ETS. In general, they support the draft and its conclusions.

2023990022